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19 Attorneys for Plaintiff DISH Network L.L.C.

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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

DISH NETWORK L.L.C.,

Plaintiff,

v.

JADOO TV, INC. et al.,

Defendants.

Case No. 2:18-cv-9768-FMO (KSx)

**DISH NETWORK L.L.C.'S NOTICE
OF MOTION FOR AWARD OF
EXPENSES INCURRED IN
BRINGING MOTION TO COMPEL
SAJID SOHAIL'S PRODUCTION OF
DOCUMENTS (DKT. 75)**

Date: October 2, 2019

Time: 11:00 a.m.

Ctrm: 580

Judge: Hon. Karen L. Stevenson

1 TO DEFENDANTS AND THEIR ATTORNEY'S OF RECORD:

2 PLEASE TAKE NOTICE that on October 2, 2019 at 11:00 AM or as soon
3 thereafter as the matter may be heard, before the Honorable Karen L. Stevenson of
4 the United States District Court for the Central District of California, Roybal Federal
5 Building and Courthouse, 255 E. Temple St., Courtroom 580, Los Angeles, CA
6 90012, Plaintiff DISH Network L.L.C. ("DISH") will, and hereby does, move this
7 Court pursuant to Federal Rule of Civil Procedure 37(a)(5)(A) and the Court's Order
8 of August 14, 2019 (Dkt. 96), for an award of expenses incurred in bringing its motion
9 to compel Sajid Sohail's production of documents (Dkt. 75). DISH requests an award
10 of \$20,645.55 (44.9%) in attorney's fees and \$1,819.87 in costs.

11 This motion is based upon this Notice of Motion, the Memorandum of Points
12 and Authorities in Support of the Motion, the Declaration of Stephen M. Ferguson
13 and all pleadings and records on file in this action and any other arguments and
14 evidence presented to this Court at or before the hearing on this motion.

15 Pursuant to Civil Local Rule 7-3, DISH met and conferred with counsel for
16 Defendant Sajid Sohail, on the matters in this motion on August 16, 2019, and
17 Defendant opposes this motion.

18 Dated: August 21, 2019 Respectfully submitted,

19 By: /s/ Stephen M. Ferguson

20 Stephen M. Ferguson (*pro hac vice*)

21 stephen.ferguson@hnbllc.com

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6 *Attorneys for Plaintiffs DISH Network L.L.C.*

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